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November 9, 2000

VIA COURIER

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RFB Cellular, Inc. and Alpine PCS, Inc.; E-911 Phase II Implementation Plan, CC Docket No. 94-102

Dear Ms. Salas:

Enclosed for filing on behalf of RFB Cellular, Inc. and Alpine PCS, Inc. are an original and four copies of an implementation plan for E-911 Phase II compliance. Please direct any questions about this submission to the undersigned.

Sincerely,

Brenda J. Boykin

Brenda J. Boykin

Enclosure
cc: International Transcription Service (w/encl. on diskette)
Jay Whaley (w/ encl.)

RFB Cellular, Inc. and Alpine PCS, Inc.
E-911 Phase II Implementation Plan

Introduction

Both RFB Cellular, Inc. and Alpine PCS, Inc. have been making good faith efforts to meet the requirements set forth in the FCC's Fourth Memorandum Opinion and Order (CC Docket No. 94-102, Sept. 8, 2000). However the FCC should be aware of the difficulties faced by rural carriers in deploying E911 Phase II location solutions.

First of all, regardless of what the FCC was told during the above proceeding, some of the network-based location vendors appear to have little to no interest in serving the needs of rural carriers. In particular, the FCC rejected the request for a six-month extension from United States Cellular Corporation in part because "other network-based solutions may prove less expensive for rural carriers, such as USCC, to implement, especially where they are being offered on terms that do not require an up-front investment by carriers." (Fourth Report and Order, ¶ 71.) The reader is then referred to ¶ 29, in which the FCC discusses Cell-Loc's offer to provide ALI for 911 calls for free and U.S. Wireless' plans to establish a service bureau and provide ALI for 911 calls at a minimum cost to the carriers. As it turns out, neither Cell-Loc nor U.S. Wireless has given us any indication that it will deploy its systems in rural areas in the foreseeable future. Cell-Loc is only planning to deploy in about 42 major metropolitan areas, and U.S Wireless is only planning to deploy in the top 100 metropolitan areas. In fact, neither company would respond to an RFI sent out in August to each company by us. Nor would either company respond to, or return, repeated phone calls. So their claims and Ex Parte filings to the FCC appear to have no basis in fact when it comes to rural carriers. As for the other network-based E911 Phase II location vendors, Alpine PCS/RFB Cellular was finally successful in obtaining proposals from two vendors, but in both cases only after repeated requests and pleas.

In the case of handset-based E911 location approaches, much has been made of the availability of GPS capable handsets. Regardless of claims by Qualcomm, it does not look like GPS handsets will in fact be available in time to support the needs of rural carriers. In particular, as with many rural carriers we still sell a lot of 3 Watt "bag phones," and we know of no vendor that is planning a GPS capable bag phone. More importantly, the GPS approach embraced by the FCC is in fact Assisted GPS (AGPS) in which network elements are needed to support the GPS capability of the handset. We know of no network infrastructure vendor that has yet implemented the network changes necessary to provide the network-assist capability for such handsets. In fact, Motorola has informed us that it will not have such capability in its network infrastructure until the middle of 2002 at the earliest. Thus a handset-based solution is not an option to us since we use Motorola switches and base stations throughout our Michigan markets. Finally, the FCC should be aware that the cost of a handset-based solution is comprised of a lot more than the purported $10-15 per Qualcomm chipset in each phone. In addition, we understand Qualcomm is planning to charge approximately $2.50 per subscriber per year for a Right To Use (RTU) fee (or, instead, about $15.00 per subscriber for a "lifetime" RTU fee) for the network-assist part of the Assisted GPS approach. It is thus pretty obvious why Qualcomm has been so aggressive on this issue at the FCC.

In summary, Alpine PCS and RFB Cellular are striving to meet the FCC goals, but have been forced to adopt a network-based E911 location solution that might not meet the FCC accuracy requirements in the required time frame.

Background/Contact Information

(1) Carrier Identifying Information: Alpine PCS, Inc. (TRS number not yet assigned) and RFB Cellular, Inc. (TRS 812031).

(2) Contact Information: Arthur L. Prest, Vice President & CTO, 10234 Democracy Boulevard, Potomac, MD 20854; Telephone 301-983-3072; FAX 301-983-6536; prest@dc.net

E911 Phase II Location Technologies Information

(1) Type of Technology: We plan to use a network-based E911 Phase II location technology that utilizes TDOA for location determination. Our plan at this time is to use either TruePosition or Grayson Wireless in all markets as our primary vendor for the location determining equipment required to meet the E911 Phase II location requirements.

(2) Testing and Verification: Testing and verification will be done in a manner consistent with FCC OET Bulletin No. 71. It is not clear at this time whether testing and verification will be done by an independent firm such as TechnoCom Corporation, or the location system vendor, or SCC or GTE TSI.

(3) Implementation Details and Schedule: Significant changes and additions will be required to implement E911 Phase II location capabilities in all of our markets. New switch software will be required. We will need to engineer, furnish and install electronic equipment at each cell site and at the Mobile Switching Center (MSC). This equipment is coupled to existing antennas at the cell site and connected over transmission facilities back to the new Positioning Determining Equipment (PDE) located at the MSC. The PDE and MSC are in turn connected to a remote Switching Control Point (SCP) that acts as a Mobile Positioning Center (MPC) that also interfaces with an ALI database that can be accessed by PSAPs. New SS7 links will be provisioned to connect the MPC to the MSC. The MSC is also connected by voice trunks to the E911 Selective Router that in turn provides connections to the PSAPs. Detailed installation schedules are not available at this time, but our efforts will be scheduled based on formal PSAP requests for Phase II E911 Location Services and implemented in a timely fashion so as to meet FCC requirements.

(4) PSAP Interface: We will be using an NCAS approach for all markets in Michigan and California. We also plan to use either SCC or GTE TSI as an outsourced service bureau for the Mobile Positioning Center (MPC) functionality. The specific hardware and software changes required will vary from PSAP to PSAP. However,

it will be the responsibility of each individual PSAP to be able to accept the E911 Phase II location information as defined by industry standards. The installation of the requisite hardware and software will be implemented in a timely fashion so as to meet FCC requirements.

(5) Existing Handsets: Not applicable given that a network-based E911 Phase II solution is planned.

(6) Location of Non-Compatible Handsets: Not applicable given that a network-based E911 Phase II solution is planned.

(7) Other Information: We have not received a PSAP request for E911 Phase II service in any of our markets. It should be noted that RFB Cellular was the first wireless carrier to provide E911 Phase I service in Northern Michigan! We are now working to complete the provisioning of Phase I service that was requested last month by most of the other PSAPs in our Michigan markets.